



California Table
Grape
Commission

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To Whom it May Concern:

On behalf of the growers of fresh grapes in California, we are writing to comment about the proposed rule from the Agriculture Marketing Service outlining the requirements for the Specialty Crop Block Grant Program.

California produces 98 percent of the fresh grapes grown in the United States. As founding members of the California 5 A Day program and the national Produce for Better Health Foundation, we understand both the financial impact and the positive human health potential for specialty crops. And we strongly support measures such as this block grant program which will enhance the long-term sustainability of specialty crops.

Base Funding – As currently drafted, the proposed rule states, "Subject to the appropriation of funds, each State that applies is to receive at least \$100,000 to enhance the competitiveness of specialty crops." This seems to imply that each state that applies will receive \$100,000 regardless of the strength of their application or the economic impact of their specialty crop industry.

Competitiveness – Related to the above issue, we believe that states should be required to demonstrate in their applications how a requested state block grant supports specialty crop competitiveness through areas such as research, promotion, nutrition, trade enhancement or other specific means.

Measurement – In line with the need for states to articulate the potential impact that a block grant would have to a state's specialty agriculture industries, there

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need to be adequate measurement instruments that focus not only on traditional measures such as increased consumption, market penetration and consumer awareness but also on long-term benefit to the affected industries.

All sectors – Language in the proposed rules appears to give priority to "fresh specialty crop projects." It is our belief that the block grants should be available to all specialty crops as defined in the law with no priority to one sector of specialty crops over another.

Timeline – Finally, we would like to add our strong support to the language in the proposed rule that would allow projects to carry over for up to three years.

Regards,



Kathleen Nave
President